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KING COUNTY
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CASE NUMBER: 12-2-23705-1 SEA

Honorable Susan Craighead

SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

T.V., a single woman,

Plaintiff,

v.

CATHOLIC COMMUNITY SERVICES
OF WESTERN WASHINGTON, a
Washington corporation; and THE MATT
TALBOT NEW HOPE RECOVERY
CENTER, a/k/a THE MATT TALBOT
CENTER,

Defendants.

No. 12-2-23705-1 SEA

ANSWER, AFFIRMATIVE
DEFENSES, AND COUNTERCLAIMS
OF CATHOLIC COMMUNITY
SERVICES OF WESTERN
WASHINGTON

COMES NOW Defendant Catholic Community Services of Western Washington (referred to herein as "the Defendant"), by and through its counsel of record, Patterson Buchanan Fobes & Leitch, Inc., P.S., and hereby answers the Complaint for Personal Injury by Plaintiff T.V. (referred to herein as "the Plaintiff"). Unless specifically admitted, all allegations contained in the Plaintiff's complaint are denied. The Defendant further expressly denies all allegations of any kind of wrongdoing against Plaintiff.

ANSWER AND AFFIRMATIVE DEFENSES - 1
207136

PATTERSON BUCHANAN
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1 1.1 Answering paragraph 1.1 of the Plaintiff's Complaint, the Defendant has
2 insufficient knowledge or information to form a belief as to the truth or falsity of this
3 allegation; therefore, the Defendant denies the same.

4 1.2 Answering paragraph 1.2 of the Plaintiff's Complaint, the Defendant admits that
5 The Matt Talbot New Hope Recovery Center, also known as The Matt Talbot Center, is a
6 Washington state licensed treatment program serving the homeless, addicted, and mentally ill.
7 The Defendant admits that The Matt Talbot Center is located in Seattle, Washington. As to any
8 remaining allegations, the Defendant denies the same.

9 1.3 Answering paragraph 1.3 of the Plaintiff's Complaint, the Defendant admits that
10 Catholic Community Services of Western Washington is a Washington non-profit corporation
11 under the leadership of the Archbishop of Seattle and the Board of Trustees. The Defendant
12 admits that Catholic Community Services of Western Washington administers The Matt Talbot
13 Center. The allegation that the Defendant is "responsible for the actions of the Talbot Center"
14 calls for a legal conclusion for the court to determine; therefore, the Defendant denies the same.
15 As to any remaining allegations, the Defendant denies the same.

16 1.4 Answering paragraph 1.4 of the Plaintiff's Complaint, the Defendant admits that
17 David Scratchley worked (first as a contractor and then as an employee) for The Matt Talbot
18 Center from approximately April 2006 until September 2011, but denies that David Scratchley
19 was employed by The Matt Talbot Center. The Defendant denies that David Scratchley was
20 employed as "the director of the drug treatment programs." As to any remaining allegations,
21 the Defendant denies the same.

22 1.5 Answering paragraph 1.5 of the Plaintiff's Complaint, the allegations call for
23 legal conclusions for the court to determine; therefore, the Defendant denies the same.

24 2.1 Answering paragraph 2.1 of the Plaintiff's Complaint, the Defendant has
25 insufficient knowledge or information to form a belief as to the truth or falsity of the allegation

1 that "David Scratchley held himself out as a psychologist;" therefore, the Defendant denies the
2 same. The Defendant admits that David Scratchley was "an expert on such topics as parenting,
3 drug treatment, and mental health conditions accompanying addiction." The Defendant admits
4 that David Scratchley "authored books on the subjects, frequently gave speeches to various
5 groups, and co-hosted a radio show." As to any remaining allegations, the Defendant denies
6 the same.

7 2.2 Answering paragraph 2.2 of the Plaintiff's Complaint, the Defendant denies that
8 "The Talbot Center hired [David] Scratchley to become the director of its drug treatment
9 programs." The Defendant denies that "The Talbot Center did not check [David] Scratchley's
10 references, credentials, or contact his previous employers to determine his suitability to direct
11 the treatment programs and offer psychological counseling." The Defendant denies that
12 "[David] Scratchley remained employed at The Matt Talbot Center until approximately July
13 2011." The Defendant denies that "The Matt Talbot Center trumpeted [David] Scratchley on
14 its website as a respected psychologist in its treatment programs." The Defendant admits that
15 The Matt Talbot Center had posted the following language on its website: "[S]upervised by Dr.
16 David Scratchley, Ph.D., Clinical Psychologist and renowned Addictionologist, our recovery
17 and relapse prevention program addresses the physiology, psychology, and sociology of
18 addiction." The Defendant has insufficient knowledge or information to form a belief as to the
19 truth or falsity of the allegation that [David] Scratchley has never been a licensed psychologist
20 in the state of Washington;" therefore, the Defendant denies the same. The Defendant has
21 insufficient knowledge or information to form a belief as to the truth or falsity of the allegation
22 that "the only state health license [David] Scratchley held was an entry level certification as a
23 chemical dependency trainee, licensed in 2009;" therefore, the Defendant denies the same. As
24 to any remaining allegations, the Defendant denies the same.

25 2.3 Answering paragraph 2.3 of the Plaintiff's Complaint, the Defendant admits that
David Scratchley worked (first as a contractor and then as an employee) for The Matt Talbot